

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of Union Electric Company)
d/b/a Ameren Missouri’s 4th Filing to)
Implement Regulatory Changes in Furtherance) **File No. EO-2023-0136**
of Energy Efficiency as Allowed by MEEIA)

JOINT MOTION FOR EXTENSION

COMES NOW the Staff (“Staff”) of the Missouri Public Service Commission, Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”), the Office of Public Counsel (“OPC”), Renew Missouri Advocates d/b/a Renew Missouri (“Renew Missouri”), and Natural Resources Defense Council (“NRDC”) (collectively, the “Parties”)¹, and for their *Joint Motion for Extension* respectfully state:

1. On June 14, 2024, the Parties filed with the Commission a *Joint Motion to Amend Procedural Schedule*.² The Parties agreed to amend the schedule by extending discovery and the filing of the *List of Issues, List of Witnesses, and Order of Cross-Examination* to June 30, 2024. The Parties also agreed to extend the evidentiary hearing dates from July 24-26, 2024 to July 22-26, 2024.

2. The Commission issued its *Order Directing Filing* on June 17, 2024, extending the deadlines for discovery and the filing of the *List of Issues, List of Witnesses,*

¹ At the time of this filing, Midwest Energy Consumers Group (“MECG”) and Consumers Council of Missouri (“Consumers Council”) had not yet responded whether they were in agreement or opposed to the Parties’ request for an extension.

² At the time of the filing, Renew Missouri had not yet responded whether it was in agreement or opposed to the Parties’ request. Renew Missouri did not subsequently object.

and Order of Cross-Examination to July 1, 2024. The Commission did not rule on the request to extend the evidentiary hearing dates.

3. The OPC filed a *Motion to Schedule Procedural Conference* on June 21, 2024, asking that the Commission schedule a procedural conference as soon as possible to discuss the extension. After the Parties made a joint filing on June 26, 2024 with available dates for a discovery conference, the Commission issued an order on June 28, 2024 setting a procedural conference for July 2, 2024 at 9:00 A.M.

4. So that the Parties may discuss the *List of Issues, List of Witnesses, and Order of Cross-Examination* during the procedural conference, the Parties respectfully request the Commission extend the filing date from July 1, 2024 to July 3, 2024.

5. Position statements are not scheduled to be filed until July 17, 2024, and the evidentiary hearing is still several weeks away. No party will be prejudiced by extending the deadline to file *the List of Issues, List of Witnesses, and Order of Cross-Examination* from July 1, 2024 to July 3, 2024.

WHEREFORE, the Parties respectfully request that the Commission extend the filing date for the *List of Issues, List of Witnesses, and Order of Cross-Examination* from July 1, 2024, to July 3, 2024.

Respectfully Submitted,

/s/ Travis J. Pringle

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**ATTORNEYS FOR NATURAL
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 1st day of July, 2024, to all parties and/or counsel of record.

/s/ Travis J. Pringle